

# EXHIBIT J

## UNITED STATES DISTRICT COURT

## FOR THE DISTRICT OF ARIZONA

Sean Bennett, an individual, )  
)  
Plaintiff, )  
)  
vs ) Case No. 2:23-cv-02425-ROS-DMF  
)  
City of Phoenix, a )  
governmental entity; American )  
Airlines, Inc., a foreign )  
corporation; Officer Joel )  
Cottrell and Jane Doe )  
Cottrell, a married couple; )  
Officer Benjamin Denham and )  
Jane Doe Denham, a married )  
couple; Officer Todd Blanc )  
and Jane Doe Blanc, a )  
married couple; Officer Peru )  
and Jane Doe Peru, a married )  
couple; Sergeant Hogan and )  
Jane Doe Hogan a married )  
couple, )  
)  
Defendants. )  
\_\_\_\_\_ )

## VIDEOTAPED DEPOSITION OF OFFICER TODD BLANC

Phoenix, Arizona

May 29, 2025

1:11 p.m.

## REPORTED BY:

Susan A. Grenz, RPR  
Certified Reporter  
Certificate No. 50720

Officer Todd Blanc, 5/29/2025

1 THE VIDEOTAPED DEPOSITION OF OFFICER TODD BLANC  
2 was taken on May 29, 2025, commencing at 1:11 p.m. with  
3 the witness appearing at the offices of Jones, Skelton &  
4 Hochuli, 40 North Central Avenue, Suite 2700, Phoenix,  
5 Arizona, taken before Susan A. Grenz, a Certified Court  
6 Reporter in the State of Arizona, via Zoom  
7 videoconference.

8 **APPEARANCES:**

9 **For the Plaintiff:**

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11 By: Sean A. Woods, Esq.  
12 5055 North 12th Street  
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14 Phoenix, Arizona 85014  
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16 (Appeared via videoconference)

14 **For the Defendant American Airlines, Inc.:**

15 WILSON, ELSER, MOSKOWITZ, EDELMAN &  
16 DICKER LLP  
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20 **For the Defendant Todd Blanc:**

21 JONES, SKELTON & HOCHULI, PLC  
22 By: Brian J. Ripple, Esq.  
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bripple@jshfirm.com  
(Appeared via teleconference)

**Also Present: Jesus Arellano-Ortiz, Videographer**  
(Appeared via teleconference)

Officer Todd Blanc, 5/29/2025

1 investigation. 01:41:02

2 A. Nothing that I was aware of. 01:41:04

3 Q. Okay. Do you recall ever talking to any of the 01:41:06

4 other officers and gathering any additional information 01:41:11

5 that would give you insight into what happened on the 01:41:14

6 flight before the incident? 01:41:16

7 A. No. 01:41:20

8 Q. Is there specific training that you have to go 01:41:32

9 through once you -- or maybe beforehand -- but once you 01:41:35

10 get the airport job, do you have to go through a new or 01:41:40

11 different type of training that somehow relates to the 01:41:44

12 specifics of working inside the airport environment? 01:41:48

13 A. There's orientation, training. There's some 01:41:51

14 specialty training for how to deal with instances on an 01:41:53

15 aircraft -- 01:41:57

16 Q. Sure. 01:41:59

17 A. -- but nothing -- I mean, I'm still a police 01:42:00

18 officer so the police training is still in effect. 01:42:03

19 Q. Sure, yeah, of course. 01:42:05

20 That training, I'm assuming -- you know, I'm 01:42:11

21 assuming that a police officer undergoes training, you 01:42:11

22 received training on how to assess the situations you 01:42:13

23 encounter, how to assess body language, threats, 01:42:18

24 reactions, things like that? 01:42:20

25 A. Yes. 01:42:23

Officer Todd Blanc, 5/29/2025

1 Q. I assume police officers are trained to 01:42:24  
2 evaluate a situation in order to act -- react 01:42:27  
3 appropriately, not to overreact, correct? 01:42:28  
4 A. Correct. 01:42:33  
5 Q. I have to assume that officers are trained to 01:42:33  
6 use physical force to subdue a subject if it's necessary, 01:42:38  
7 given the situation, or if they're noncompliant? 01:42:41  
8 A. Yes. 01:42:42  
9 Q. Okay. You have to make those decisions -- as 01:42:45  
10 an officer, you have to make those decisions based on 01:42:49  
11 what you see under the circumstances. 01:42:52  
12 Isn't that true? 01:42:52  
13 A. Yes. 01:42:54  
14 Q. At the end of your -- at the end of your 01:43:09  
15 report -- you know, in hindsight I should have kept it 01:43:13  
16 up. 01:43:18  
17 At the end of your report, the last section here 01:43:18  
18 says, "For further details regarding this incident refer 01:43:26  
19 to the original report and any other supplements." 01:43:28  
20 And I'm aware that there are -- that 01:43:34  
21 supplemental reports exist, right? But do you know, is 01:43:34  
22 that just standard language you use, or did you have the 01:43:40  
23 original, or are you referring to another -- do you know 01:43:44  
24 what this means. 01:43:47  
25 A. I had a -- my report is considered a supplement 01:43:48

Officer Todd Blanc, 5/29/2025

1	Officer Blanc.	01:53:44
2	THE WITNESS: Thank you, sir.	01:53:45
3	MR. KEARNS: Officer, I just have a couple	01:53:47
4	follow ups just based on counsel's questions.	01:53:48
5	FURTHER EXAMINATION	01:53:51
6	BY MR. KEARNS:	01:53:51
7	Q. You indicated that a call for a physical fight	01:53:51
8	would be more urgent just a moment ago, correct?	01:53:55
9	A. Yes.	01:53:59
10	Q. Okay. Would you agree that despite the level	01:54:01
11	of urgency, urgent to me means you got to get there	01:54:04
12	faster, right. But despite the level of urgency, when	01:54:06
13	you arrive at any incident, you are still individually	01:54:06
14	and independently doing an assessment of the	01:54:06
15	circumstances that you're confronted with, correct?	01:54:19
16	A. Yes.	01:54:22
17	Q. So if you have an urgent call and you arrive	01:54:22
18	somewhere and everything is calm, the fact that the call	01:54:25
19	was urgent doesn't necessarily dictate what you do next.	01:54:30
20	Would you agree with that?	01:54:33
21	A. It shifts my attention.	01:54:35
22	Q. Sure, sure.	01:54:39
23	But it wouldn't necessarily mean you would use	01:54:41
24	force even when it was unnecessary just because the call	01:54:43
25	was urgent. Agree?	01:54:47

Officer Todd Blanc, 5/29/2025

1 A. Oh, correct. 01:54:49

2 Q. I mean, if you heard that two -- 01:54:51

3 hypothetically, if you heard that two women were fighting 01:54:51

4 and you sprinted over and it was, in fact, two elderly 01:54:51

5 ladies yelling at each other from across the room, the 01:54:51

6 fact that you heard they were fighting wouldn't 01:55:05

7 necessarily make you run and tackle one of them? 01:55:07

8 A. No, sir. 01:55:10

9 MR. WOODS: Form. 01:55:11

10 BY MR. KEARNS: 01:55:11

11 Q. You indicated you had looked over -- and I like 01:55:12

12 the word that you used. I think I used "scuffle," but 01:55:16

13 you said there was a struggle and they were either going 01:55:17

14 to the ground or on the ground when you -- when you saw 01:55:21

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15    it, right?                                01:55:25
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16 A. Yes. 01:55:25

17 Q. Okay. Generally speaking, would you agree that 01:55:27

18 an officer wouldn't or shouldn't at least physically 01:55:27

19 subdue an individual if they are otherwise compliant and 01:55:32

20      **nonthreatening?** 01:55:34

21 A. Correct. 01:55:37

22 Q. Does the struggle that you saw Officer Denham 01:55:37

23 in with Mr. Bennett, does that suggest to you that 01:55:41

24 Mr. Bennett was in some fashion noncompliant or 01:55:44


25 threatening to Officer Denham? 01:55:44

1 STATE OF ARIZONA )  
2 ) SS  
3 COUNTY OF MARICOPA )

4 BE IT KNOWN that the foregoing videotaped  
5 deposition proceedings were taken before me; that the  
6 witness before testifying was duly sworn by me to testify  
7 to the whole truth; that reading and signing the  
8 deposition transcript was waived; that the foregoing pages  
9 are a full, true, and accurate record of the proceedings,  
10 all done to the best of my skill and ability; that the  
11 proceedings were taken down by me in shorthand and  
12 thereafter reduced to print under my direction.

13 I CERTIFY that I am in no way related to any of  
14 the parties hereto nor am I in any way interested in the  
15 outcome hereof.

16 Dated at Phoenix, Arizona, this 3rd day of June,  
17 2025.

18   
19 Susan A. Grenz, RPR, CRR  
20 Certified Reporter  
21 Arizona CCR No. 50720  
22  
23  
24  
25